

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

**OFER ABARBANEL, VICTOR CHILELLI,
INCOME COLLECTING 1-3 MONTHS T-BILLS
MUTUAL FUND,**

Defendants,

And

**INSTITUTIONAL SYNDICATION LLC, NORTH
AMERICAN LIQUIDITY RESOURCES LLC,
INSTITUTIONAL SECURED CREDIT LLC,
GROWTH INCOME HOLDINGS LLC, CLO
MARKET NEUTRAL LLC, GLOBAL EMEA
HOLDINGS LLC,**

Relief Defendants.

Civil Action No. 21-CV-5429-RA

ECF CASE

**~~[PROPOSED]~~ CONSENT ORDER TEMPORARILY LIFTING
ASSET FREEZE FOR TRANSFER OF NON-FUND ASSETS**

On June 18, 2021, the Securities and Exchange Commission (Commission) filed an emergency application for an asset freeze; a proposed Order to Show Cause why the asset freeze should not be continued until the conclusion of the litigation; and other relief relating to service of process, discovery, and document preservation in the above captioned action. On that same day, the Court granted the Commission's emergency motion for an asset freeze and other relief and scheduled a hearing on the Order to Show Cause for June 30, 2021 [ECF #4]. On June 24,

2021, on joint letter motion of the parties, the Court entered a Consent Order Maintaining the Asset Freeze and Other Relief and Continuing the Hearing on the Order to Show Cause [ECF #27]. The Consent Order includes an Attachment A listing accounts for which the asset freeze will be maintained. Attachment A includes a Vanguard account in the name of the Robert K. Lu Individual Brokerage Account (-1044) into which \$10,000,000 in Fund assets were deposited, on or about June 17, 2021.

Following the entry of the Order to Show Cause, Robert K. Lu, counsel for the Fund, has represented that approximately \$1.5 million in assets that were frozen in the Robert K. Lu Individual Brokerage Account (-1044), in excess of \$10,000,000, are not Fund assets.

The parties now consent and agree to the following:

IT IS HEREBY ORDERED that the asset freeze is temporarily lifted only to allow Vanguard to transfer \$10,000,000 in Fund assets from the Robert K. Lu Individual Brokerage Account (-1044) to a new account to be established by Vanguard for the purposes of holding Fund assets. The new account will be frozen pursuant to this Order and the freeze will remain in place pending further Order of the Court. Once the funds are transferred to the new account, Vanguard account-ending -1044 will be released from the asset freeze.

SO AGREED:



Robert K. Lu
REID & WISE LLP
U.S. Bank Tower
633 West Fifth Street
26th Floor
Los Angeles, CA 90071
P: (213) 223.2328
C: (619) 300.1849
rlu@reidwise.com

*Counsel for Defendants Ofer Abarbanel and
Income Collecting 1-3 Months T-Bills Mutual
Fund and Relief Defendants Institutional
Syndication LLC, CLO Market Neutral LLC,
and Global EMEA Holdings, LLC*

Dated: June 24, 2021



Victor Chilelli, pro se

*On behalf of himself and Relief Defendants
North American Liquidity Resources LLC,
Growth Income Holdings LLC, and
Institutional Secured Credit LLC*

Dated: June 24, 2021



Paul W. Kisslinger (PK0764)
Sarah Heaton Concannon (SC9111)
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549
(202) 551-4427 (Kisslinger)
(202) 551-5361 (Concannon)
KisslingerP@sec.gov (Kisslinger)
ConcannonS@sec.gov (Concannon)

*Counsel for Plaintiff Securities and
Exchange Commission*

Dated: June 25, 2021

SO ORDERED:

Dated: June 28, 2021

A handwritten signature in blue ink, consisting of a stylized 'R' followed by a horizontal line.

HONORABLE RONNIE ABRAMS
UNITED STATES DISTRICT JUDGE